

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

ALTAGRACIA J. PEGUERO,

Plaintiff,

v.

AMERICAN EXPRESS COMPANY,
INC., THE SKLOVER GROUP, INC., and
FEDERAL INSURANCE COMPANY,

Defendant.

Civil Action No. 05-10995-RCL

**ASSENTED-TO MOTION TO FURTHER EXTEND TIME TO
RESPOND TO DEFENDANT AMERICAN EXPRESS' CROSS-CLAIMS**

Pursuant to Rule 6(b) of the Federal Rules of Civil Procedure and Local Rule 7.1, Defendant Federal Insurance Company (“Federal”) respectfully moves this Court for leave to further enlarge their time to respond to the cross-claims of defendant American Express Company, Inc. (“American Express”) in the above-captioned action, located in the Answer, Affirmative Defenses and Cross-Claims of Defendant American Express Company to Plaintiff’s First Amended Complaint (the “Answer”), filed on May 31, 2005 in this Court, through and including August 19, 2005. As grounds for this motion, Federal states:

- (1) Defendant American Express has assented to this motion.
- (2) On May 31, 2005, defendant Federal was served with the Answer, which contains cross-claims for indemnification and contribution against defendants Federal and The Sklover Group, Inc. (“Sklover”).

(3) On June 20, 2005, Federal, with the assent of American Express, filed a motion to enlarge their time to respond to the cross-claims through and including July 11, 2005.

(4) On July 11, 2005, Federal, with the assent of American Express, filed a motion to enlarge their time to respond to the cross-claims through and including July 20, 2005.

(4) The further enlargement of time, through and including Friday, August 19, 2005, will enable Federal's counsel to confer with their client and to fully evaluate the cross-claims asserted in the Answer, as well as the legal defenses available to the Federal. The short extension of time will not unduly delay these proceedings.

For the foregoing reasons, Federal respectfully moves this Court to allow the motion.

Dated: Boston, Massachusetts
July 19, 2005

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By: /s/Mark W. Corner
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Attorneys for Defendant Federal Insurance Company

CERTIFICATION PURSUANT TO LOCAL RULE 7.1

Defendant Federal Insurance Company, by and through counsel, hereby certifies that they have conferred with counsel of record for co-defendant American Express Company in a good faith attempt to resolve or narrow the issues raised in this motion and that co-defendant American Express Company, acting through counsel, has assented to the granting of the relief sought herein.

/s/Mark W. Corner

Mark W. Corner

CERTIFICATE OF SERVICE

I, Mark W. Corner hereby certify that on this date, July 19, 2005, I caused to be served the foregoing document, by electronic notice, upon the following counsel of record:

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/s/Mark W. Corner

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